



RECEIVED
DIV SOLID WASTE MGT

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE

711 R. S. GASS BOULEVARD
NASHVILLE, TENNESSEE 37243

PHONE (615) 687-7000 STATEWIDE 1-888-891-8332 FAX (615) 687-7078

Group No. _____

June 5, 2012

CERTIFIED MAIL

7009 1680 0001 5181 0791

RETURN RECEIPT REQUESTED

Reggie Guidry, Operations Manager
First Response Environmental Group
1411 South Dickerson Road
Goodlettsville, Tennessee 37072
TNR 00 001 3052

Dear Mr. Guidry:

This letter confirms the observations and recommendations, which were made during the Hazardous Waste Transporter Inspection concerning your facility on May 18, 2012. The attached inspection report details the violation, which was noted during the inspection. This violation was corrected during the inspection.

Several used oil labels are attached to this inspection report for future use on your used oil containers and tank.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 687-7021.

Sincerely,

Jack Arvin

Division of Solid Waste Management
JDA/bbm/jda184 First Response Environmental Group

cc: DSWM - Central Office

HAZARDOUS WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION:

First Response Environmental Group
1411 South Dickerson Road
Goodlettsville, Tennessee 37072
TNR 00 001 3052
Davidson County

PRIMARY CONTACT:

Reggie Guidry, Operations Manager
First Response Environmental Group
1411 South Dickerson Road
Goodlettsville, Tennessee 37072
Phone: (615) 868-5544

DATE/TIME OF INSPECTION:

May 18, 2012
1:30 p.m.

INSPECTION PARTICIPANTS:

Reggie Guidry, Operations Manager
Kaylea S. Lickfelt, Marketing Manager
Al Majors, TDEC-SWM
Jack Arvin, TDEC-SWM

REPORT PREPARED BY:

Jack Arvin
Tennessee Department of Environment and Conservation
Division of Solid and Hazardous Waste Management
Nashville Field Office
711 R.S. Gass Boulevard
Nashville, Tennessee 37243-1550
Phone: (615) 687-7021

PURPOSE OF THE INSPECTION:

This inspection was conducted to evaluate the compliance status of First Response Environmental Group ("First Response") (TNR 00 001 3052) with the applicable requirements of the Rules and Regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. § 68-212-101 et seq. and Hazardous Waste Reduction Act, T.C.A. § 68-212-301 et seq. and the Used Oil Collection Act of 1993, T.C.A. § 68-211-1001 et seq.

FACILITY DESCRIPTION:

First Response, Inc. was founded in 1994 as a full emergency response, demolition, environmental abatement and industrial service company in the middle-south. In 2010, First Response was purchased by Orion Recovery Group, Inc. led by Davian Ploger, and financial investors Alarian Associates, Inc., and C3 Capital. First Response applied on December 8, 2011 for a hazardous waste transporter permit from the Department. This permit expires on January 31, 2013. First Response is in the business of cleaning up spills including hazardous wastes. As part of the service provided the recovered hazardous wastes are transported to authorized TSDFs. They also pick up the hazardous waste generated by other facilities and transport them to a TSDF. No other transportation of hazardous waste is performed by First Response. They also provide rapid emergency response, environmental remediation, industrial cleaning, environmental consulting, training, trucking and transportation services, abatement, and demolition planning and execution to their customers. These processes do not generate any hazardous waste. First Response is not operating as a transfer facility. They are only a transporter of hazardous waste.

INSPECTION FINDINGS:

Zeta Turnpike is the online route tracker for First Response to track the trucks transporting the hazardous waste. There are two gates for entering to the site. One gate has a laser motion detector and key code entry system. Twenty four hour cameras are attached to recording equipment to monitor these gates. There was a 300-gallon above ground tank on site for storing the used oil. There were also five 55-gallon drums of used oil and used oil filters on site. These used oil storage units were not labeled as used oil. The used oil and used oil filters are managed by Volunteer and Universal Oil Companies. The universal waste lamps are managed by Southeast Recycling Company.

RECORDS REVIEW:

The past three years manifests in the files were reviewed. Manifests are filed by job numbers. The copy of their current renewed transporter permits are maintained in trucks and in the files. The trucking personnel training is done on-line utilizing the infiniti.net site.

VIOLATIONS:

The following violation was cited during this compliance inspection:

VIOLATION #1 (Failure to label containers and above ground used oil storage tanks)

By failing to label the used oil container(s) [and the used oil tank] with the words "Used Oil", First Response violated Rule 1200-1-11-.11(3)(c)3(i), which requires:

Containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil".

This violation was corrected during the inspection.

RECOMMENDATIONS AND REMARKS:

We appreciate the time and cooperation we were given during the inspection. If there are any questions regarding this report, contact Jack Arvin at (615) 687-7021.

SIGNED: Jack Arvin DATE: 6/5/12

REVIEWED: Alfred Majors DATE: 6/7/2012

cc: DSWM-Central Office